

Annual 47 C.F.R. S 64.2009(e) CPNI Certification
EB Docket 06-36

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Annual 64.2009(e) CPNI Certification for 2015

Date Filed: February 26, 2016

Name of company covered by this certification: Bitcom, LLC

Form 499 Filer ID: 828145

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Name of Signatory: James D. Pennington

Title of Signatory: Owner

I, James D. Pennington, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. S 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed: James D. Pennington



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2015 Annual Statement of FCC CPNI Rule Compliance
RE: EB Docket No. 06-36

February 26, 2016

This statement serves to explain how Bitcom, LLC is complying with FCC rules related to CPNI and the privacy of customer information per Part 64, Subpart U, Sections 64.2001 through 64.2011.

- A. Bitcom, LLC has established procedures and trained employees having access to CPNI in the following areas:
1. What CPNI is and how it may be used under Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934.
 2. The different types of telecommunications and non-telecommunications affected by CPNI Rules.

3. How and when the use of CPNI requires customer authorization under Section 64.2005 and to identify uses of CPNI not requiring customer authorization. Bitcom, LLC understands that it may obtain customer approval through written, oral or electronic methods to share information for the purpose of establishing service, and that individual notice to customers is provided when soliciting approval for use of customer's CPNI.
 4. Bitcom, LLC does not share CPNI among its affiliates.
 5. Bitcom, LLC does not provide customers on-line access, therefore there is no password Authentication established.
- B. During Calendar Year 2015, there have been no actions taken against Data Brokers.
- C. During Calendar Year 2015, there have been no customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper disclosure, or online access, to individuals not authorized.
- D. Bitcom, LLC, per Section 64.2009, has a disciplinary process to follow should any unauthorized use of CPNI occur where authorization is required.
- E. Bitcom, LLC has procedures for notifying law enforcement of CPNI security breaches, with record keeping and notification to customers per Section 64.2001.